

Jahan C. Sagafi (Cal. Bar No. 224887)
 Katrina L. Eiland (Cal. Bar No. 275701)
 Julia Rabinovich (Cal. Bar No. 290730)
 OUTTEN & GOLDEN LLP
 One Embarcadero Center, 38th Floor
 San Francisco, CA 94111
 Telephone: (415) 638-8800
 Facsimile: (415) 638-8810
 E-mail: jsagafi@outtengolden.com
 E-mail: keiland@outtengolden.com
 E-mail: jrabinovich@outtengolden.com

Adam T. Klein (admitted *pro hac vice*)
 OUTTEN & GOLDEN LLP
 685 Third Avenue, 25th Floor
 New York, New York 10017
 Telephone: (212) 245-1000
 Facsimile: (646) 509-2060
 Email: atk@outtengolden.com

[Additional counsel listed on next page]

*Attorneys for Plaintiffs and Proposed Class and
 Collective Members*

Michael P. Esser (SBN 268634)
 KIRKLAND & ELLIS LLP
 555 California Street
 San Francisco, CA 94104
 Telephone: (415) 439-1400
 Facsimile: (415) 439-1500
 Email: michael.esser@kirkland.com

Emily Nicklin (admitted *pro hac vice*)
 Gabor Balassa (admitted *pro hac vice*)
 Christina Briesacher (admitted *pro hac vice*)
 KIRKLAND & ELLIS LLP
 300 N. LaSalle
 Chicago, IL 60654
 Telephone: (312) 862-2400
 Facsimile: (312) 862-2200
 Email: enicklin@kirkland.com
 Email: gabor.balassa@kirkland.com
 Email: christina.briesacher@kirkland.com

*Attorneys for Defendant
 PRICEWATERHOUSECOOPERS LLP*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

STEVE RABIN and JOHN CHAPMAN, *on behalf
 of themselves, and all others similarly situated,*

Plaintiffs,

v.

PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 3:16-cv-02276-JST

Hon. Jon S. Tigar

**JOINT STIPULATION & [PROPOSED]
 ORDER TO AMEND THE BRIEFING
 SCHEDULE ON DEFENDANT'S
 MOTION FOR JUDGMENT ON THE
 PLEADINGS AND VACATE THE
 DEADLINE ON PLAINTIFFS'
 CONDITIONAL CERTIFICATION
 MOTION**

1 Daniel Kohrman (admitted *pro hac vice*)
Laurie McCann (admitted *pro hac vice*)
2 Dara Smith (admitted *pro hac vice*)
AARP FOUNDATION LITIGATION
3 601 E. Street, N.W.
Washington, D.C. 20049
4 Telephone: (202) 434-2060
Facsimile: (202) 434-2082
5 E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
6 E-mail: dsmith@aarp.org

7 Jennifer L. Liu (Cal. Bar No. 279370)
THE LIU LAW FIRM, P.C.
8 1170 Market Street, Suite 700
San Francisco, CA 94102
9 Telephone: (415) 896-4260
Facsimile: (415) 231-0011
10 E-mail: jliu@liulawpc.com

Pursuant to Civil Local Rule 6-1(b), Plaintiffs Steven Rabin and John Chapman and Defendant PricewaterhouseCoopers LLP ("PwC") (collectively, the "Parties") hereby stipulate as follows:

WHEREAS, Defendant filed its Motion for Judgment on the Pleadings, ECF No. 55, on December 1, 2016 ("Pleadings Motion");

WHEREAS, under the District's normal scheduling rules, Plaintiffs' deadline to respond is currently set for December 15, 2016, and the hearing date is January 5, 2017;

WHEREAS, per the most recent telephonic Case Management Conference ("CMC"), the Parties intend to file their joint discovery letter by the December 16, 2016 deadline ("Discovery Letter");

WHEREAS, in light of the ongoing briefing on the discovery dispute and the potential relevance of the Pleadings Motion to both the discovery dispute and the collective action certification question, the Parties request that the Court reset the Pleading Motion schedule and vacate the deadline for Plaintiffs' conditional collective action certification motion (currently January 26, 2017), pending resolution of these matters; and

WHEREAS, in light of the potential relevance of the Pleadings Motion to the Discovery Letter, the Parties request that the Court consider resolution of the two matters together.

THEREFORE, the Parties, through their respective counsel, hereby stipulate to the following:

1. Plaintiffs' response to Pleadings Motion shall be due January 13, 2017.
2. PwC's reply in support of its Pleadings Motion shall be due January 26, 2017.
3. The hearing on the Pleadings Motion shall be set for February 9, 2017 or as soon thereafter as the Court may hear the Parties.
4. The deadline for Plaintiffs' conditional collective action certification motion shall be VACATED. The deadline shall be reset by the Court.

1 Dated: December 7, 2016

2 /s/ Jahan C. Sagafi

3 Jahan C. Sagafi (Cal. Bar No. 224887)
4 Katrina L. Eiland (Cal. Bar No. 275701)
5 Julia Rabinovich (Cal. Bar No. 290730)
6 OUTTEN & GOLDEN LLP
7 One Embarcadero Center, 38th Floor
8 San Francisco, CA 94111-3339
9 Telephone: (415) 638-8800
10 Facsimile: (415) 638-8810
11 Email: jsagafi@outtengolden.com
12 Email: keiland@outtengolden.com
13 Email: jrabinovich@outtengolden.com

14 Adam T. Klein (admitted *pro hac vice*)
15 OUTTEN & GOLDEN LLP
16 685 Third Avenue, 25th Floor
17 New York, New York 10017
18 Telephone: (212) 245-1000
19 Facsimile: (646) 509-2060
20 Email: atk@outtengolden.com

21 Daniel Kohrman (admitted *pro hac vice*)
22 Laurie McCann (admitted *pro hac vice*)
23 Dara Smith (admitted *pro hac vice*)
24 AARP FOUNDATION LITIGATION
25 601 E. Street, N.W.
26 Washington, D.C. 20049
27 Telephone: (202) 434-2060
28 Facsimile: (202) 434-2082
E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
E-mail: dsmith@aarp.org

Jennifer L. Liu (Cal. Bar No. 279370)
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, CA 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

*Attorneys for Plaintiffs and Proposed Class
and Collective Members*

/s/ Emily Nicklin

Emily Nicklin (*pro hac vice*)
Gabor Balassa (*pro hac vice*)
Christina Briesacher (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 N. LaSalle
Chicago, IL 60654
Telephone: (312) 862-2400
Facsimile: (312) 862-2200
Email: enicklin@kirkland.com
Email: gabor.balassa@kirkland.com
Email: christina.briesacher@kirkland.com


Michael P. Esser (SBN 268634)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
Email: michael.esser@kirkland.com

*Attorneys for Defendant
PRICEWATERHOUSECOOPERS LLP*

ORDER

Pursuant to the Stipulation, it is so ORDERED.

Dated: December 7, 2016

By: 
The Honorable Jon S. Tigar
UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)

I, Jahan C. Sagafi, am the ECF User whose ID and password are being used to file this document. I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: December 7, 2016

By: /s/ Jahan C. Sagafi
Jahan C. Sagafi